



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

May 13, 2016

Mark Brown, Project Manager
RMPs for Western Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

Dear Mr. Brown:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the U.S. Environmental Protection Agency has reviewed the Bureau of Land Management's Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS) for western Oregon (EPA Project Number: 12-0020-BLM).

The PRMP/FEIS will revise the 1995 Resource Management Plans (RMPs) for the Coos Bay, Eugene, Medford, Roseburg, and Salem Districts and the Klamath Falls Field Office in the Lakeview District. The PRMP is intended to provide a sustained yield of timber, contribute to the conservation and recovery of threatened and endangered species, provide clean water in watersheds, restore fire-adapted ecosystems, provide recreation opportunities, and coordinate management of lands surrounding the Coquille Forest with the Coquille Tribe. The FEIS analyzes a No Action alternative of continued implementation of the 1995 RMPs, four action alternatives (A, B, C, and D); two sub-alternatives (sub-B and sub-C); and the Proposed RMP, which incorporates elements from each of the action alternatives and the no action alternative.

In our July 29, 2015 comments on the DEIS, we recommended changes to the draft preferred alternative (Alternative B). Specifically, we recommended that the riparian strategy under Alternative B be modified to incorporate the stream buffering concepts from Alternatives A or D, and elements from the No Action Alternative, including the use of watershed analysis and the delineation of key watersheds. Our comments on the DEIS also recommended retaining the Harvest Land Base strategy under Alternative B.

We find the FEIS/PRMP to be responsive to our comments and recommendations. In particular, we are pleased with the way in which the PRMP carries forward the concept of key watersheds, informed by critical habitat and high intrinsic potential habitat. We also support the buffering strategy brought forward in the PRMP. The riparian strategy principally incorporates elements from Alternatives A and D, though it does seek to incorporate elements of Alternative C (maximizing management flexibility) in those areas that do not contain critical habitat or high intrinsic potential. We find this approach to be fully responsive to the identified purpose and need in the FEIS.

We also support the proposed harvest land base strategy (modified Alternative B). The proposed harvest land base strategy, in concert with the proposed aquatic strategy, will allow for the continuity of key

landscape functions, including the provision of timber, while providing clean water and contributing to the conservation and recovery of threatened and endangered species.

With regard to monitoring, we note that Appendix V includes a commitment to both implementation and effectiveness monitoring. This includes BLM's continued participation in the existing interagency effectiveness monitoring modules (aquatic and riparian ecosystems; late-successional and old growth; marbled murrelet; northern spotted owl; socioeconomic; and tribal). We are very supportive of this direction. The monitoring information gathered through these modules will continue to provide a basis for the BLM to determine whether the RMP is effectively meeting its objectives. We have also reviewed the implementation monitoring questions. We find these to be adequately detailed and appropriately tied to proposed management direction. The proposed monitoring return interval is likewise adequate to effectively determine implementation success.

By structuring the draft alternatives to represent a range of overall management approaches (rather than exemplify gradations in design features), the BLM provided the decision space necessary to craft a PRMP that is maximally responsive to the stated purpose and need. The EPA has appreciated the opportunity to participate in the RMP/EIS development process as a cooperating agency and we look forward to working with the BLM as this plan is implemented.

Again, we appreciate the opportunity to provide comments and we welcome the opportunity to continue to engage with the BLM as you move forward. If you have any questions about our comments, please contact me at (206) 553-1601, or by electronic mail at littleton.christine@epa.gov, or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is fluid and cursive, with the first name being the most prominent.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit